



January 30, 2025

**VIA ECF**

Honorable Judge Arun Subramanian  
U.S. Southern District of New York  
500 Pearl Street, Room 15A  
New York, NY 10007

Re: Case No.: 1:24-CV-02246 *Kwoka, et al v. D'Angelo d/b/a Lasting Memories*

Dear Honorable Judge Subramanian,

I write to respectfully request an adjournment of the March 6, 2025 hearing to March 13, 2025, or any available date thereafter. Mr. Kwoka was prepared to arrive for the initial February 13, 2025 date, however, due to certain conflicting engagements is unable to appear in person at the currently scheduled March 6, 2025 hearing.

I apologize for the delay in making such request as Mr. Kwoka is currently in Guatemala, conducting voluntary work with the local indigenous tribes, by helping them to establish manufacturing and marketing operations for their products.

Also, during the above evidentiary hearing and pursuant to the enclosed Electronic Device and Wi-Fi Access Request Form, Plaintiff would like to make a visual presentation to the Court base on the produced in discovery QuickBooks files, which contrary do Defendant's claims, contains all relevant financial data of the company. Should the request be granted, Plaintiff will promptly provide the Court with a copy of such files.

Finally, regarding Ms. Platt's most recent correspondence, which was already addressed by this Court, I would only like to provide a short statement as to, yet another, Defendant's misrepresentation directed against me and my clients.

On January 16, 2025, I received Ms. Platt's multiple requests for six vendors' contact information (see enclosed exhibit "PX-1"). On January 17, 2025, I promptly issued a combined reply and haven't heard back from Ms. Platt regarding any further requests, only to receive copy of today's letter alleging withholding of some 70 vendors contact information, all of which are readily available.

Application DENIED. It's not clear from this letter what commitments prevent Mr. Kwoka from attending the March 6, 2025 hearing in person, but this is the second time Mr. Kwoka has been traveling abroad during a scheduled court conference. Mr. Kwoka brought this suit. If he is interested in continuing to pursue it, he must attend the March 6, 2025 conference in person. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 87.

Respectfully submitted,

/s/ Marius Gebski  
Marius Gebski

SO ORDERED.

Arun Subramanian, U.S.D.J.

Date: January 31, 2025

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